



August 13, 2008

**BY ELECTRONIC FILING AND BY FAX**

Honorable Michael A. Shipp  
U.S. Magistrate, United States District Court  
Martin Luther King Building & US Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: Walsh Securities, Inc. v. Cristo Property Management, et al.  
United States District for the District of New Jersey  
Civil Action No. 97-3496 (DRD)

Dear Judge Shipp:

We represent the defendant Commonwealth Land Title Insurance Company in this case. We are in receipt of an August 8, 2008 letter from Robert A. Magnanini, Esq., the attorney for the plaintiff to Your Honor requesting leave to file a reply brief in support of plaintiff's pending motion for leave to file a Fourth Amended Complaint that is longer than permitted by the Local Rules. As we have noted in our pending application seeking to depose a representative of the plaintiff for longer than one day/seven hours, this is a complex case involving numerous defendants, involving numerous causes of action and in which the plaintiff seeks significant damages. In light of those factors this is not the case in which one could expect that limitations concerning the length of discovery, or the length of briefs, would apply. Accordingly, we have no objection to plaintiff's request for leave to file a reply brief longer than permitted by the Local Rules.

Respectfully submitted,

David R. Kott

DRK:ys

cc: Robert A. Magnanini, Esq. (by electronic filing and by fax)  
Edward J. Hayes, Jr., Esq. (by electronic filing and by fax)  
Martin R. McGowan, Jr., Esq. (by electronic filing and by fax)  
All Persons on the Attached Service List

David R. Kott  
Partner  
T. 973.622.4444  
F. 973.624.7070  
dkott@mccarter.com

McCarter & English, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
T. 973.622.4444  
F. 973.624.7070  
www.mccarter.com

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WILMINGTON

**SERVICE LIST**

**WALSH SECURITIES, INC. V. CRISTO PROPERTY MANAGEMENT, ET AL**  
**CIVIL ACTION NO. 97-3496 (DRD)**

Robert A. Magnanini, Esq.  
Boies, Schiller & Flexner LLP  
150 John F. Kennedy  
Short Hills, NJ 07078

**Attorney for plaintiff Walsh Securities, Inc. and for third-party defendant Robert Walsh**

Ronald M. Kleinberg, Esq.  
Richard A. Finkel, Esq.  
Meissner, Kleinberg & Finkel, LLP  
275 Madison Ave., Suite 1000  
New York, New York 10016

**Attorney for defendants Cristo Property Management, LTD, DEK Homes of NJ, Inc.,  
Oakwood Properties, Inc., and William J. Kane**

Michael D. Schottland, Esq.  
Lomurro, Davison, Eastman & Muñoz, P.A.  
100 Willowbrook Road  
Freehold, NJ 07728

**Attorney for Defendants National Home Funding, Inc. and Robert Skowrenski, II**

Martin R. McGowan, Jr., Esq.  
Methfessel & Werbel  
3 Ethel Road  
Suite 300  
Edison, New Jersey 08818

**Attorneys for Defendant Coastal Title Agency**

Edward C. Bertucio, Jr., Esq.  
Hobbie, Corrigan, Bertucio & Tashjy, P.C.  
125 Wyckoff Road  
Eatontown, NJ 07724

**Attorney for Defendant Michael Alfieri, Esq.**

Robert J. Reilly, III, Esq.  
Reilly, Supple & Wischusen, LLC  
571 Central Avenue  
New Providence, NJ 07974

**Attorney for defendant Michael Alfieri, Esq. on the Sixth Count**

Theodore W. Daunno, Esq.  
1033 Clifton Avenue  
Clifton, New Jersey 07013

**Attorney for Defendant Lawrence M. Cuzzi**

Mark W. Catanzaro, Esq.  
Blason IV  
Suite 208  
513 Lenola Road  
Moorestown, New Jersey 08057

**Attorney for defendants Richard Pepsny and Donna Pepsny**

Thomas D. Flinn, Esq.  
Garritty, Graham, Favette & Flinn  
1 Lackawanna Plaza, Box 4205  
Montclair, NJ 07042

**Attorney for Defendant Anthony M. Ciccalese (on certain counts of the Complaint)**

Anthony M. Cicalese, Esq.  
467 Long Hill Drive  
Short Hills, NJ 07078

**Pro se (on certain counts of the Complaint)**

Anthony M. Cicalese  
74C Manatiales de Belen  
200 Mtrs Norte de igleseis de Ascen  
San Antonio de Belen  
Heredia, Costa Rica

**Pro se (on certain counts of the Complaint)**

Anthony Argiropoulos, Esq.  
Fox, Rothschild, O'Brien & Frankel  
997 Lenox Drive, Bldg. 3  
Lawrenceville, New Jersey 08648

**Attorney for Defendants Fidelity National Title Insurance and Nations Title Insurance**

Edward J. Hayes, Jr., Esq.  
Fox, Rothschild, O'Brien & Frankel  
2000 Market Street  
10<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19103-3291

**Attorney for Defendants Fidelity National Title Insurance and Nations Title Insurance**

Pasquale Menna, Esq.  
Kauff and Menna  
170 Broad Street  
P.O. 762  
Red Bank, New Jersey 07701

**Attorneys for defendant Roland J. Pierson**

Marc D. Freedman, Esq.  
Freedman & Gersten, LLP  
777 Terrace Avenue, 5<sup>th</sup> Floor  
Hasbrouck Heights, NJ 07604

**Attorney for Third Party Defendant Elizabeth Ann DeMola**

Thomas Brodo, Pro Se  
139B Fort Lee Road  
Teaneck, New Jersey 07666

James R. Brown, Pro Se  
1089 Cedar Avenue  
Union, New Jersey 07083

Richard Calanni, Pro Se  
One Old Farm Road  
Tinton Falls, New Jersey 07724

Anthony D'Apolito, Pro Se  
909 Woodland  
Wall Township, NJ 07719

Richard DiBenedetto, Pro Se  
3 Loller Drive  
Martinsville, New Jersey 08836

Stanley Yacker, Esq., Pro Se  
33 Broadway, #1  
Ocean Grove, NJ 07756-1397

William Kane, Pro Se  
6119 Kipps Colony Drive  
Gulfport, Florida 33707

Capital Assets Property Management, LLC  
10 West Bergen Place  
Red Bank, NJ 07701

Andrew I. Indeck, Esq.  
Scarinci & Hollenbeck, LLC  
1100 Valleybrook Avenue  
P.O. Box 790  
Lyndhurst, NJ 07071

**Attorney for Garden State Indemnity Co. (Legal Malpractice carrier  
for defendant Michael Alfieri)**